

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

LAUTHA V. ANDERSON, SR.,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:17-CV-02659-AGF
)	
CHANTAY GODERT, et al.,)	
)	
Defendants.)	

DEFENDANTS' EXHIBIT LIST

Inasmuch as Plaintiff has the burden of proof, Defendants cannot make a determination until the close of plaintiff's case as to all the evidence Defendants will present. Defendants may present the following exhibits:

Inasmuch as Plaintiff has the burden of proof, Defendants cannot make a determination until the close of Plaintiff's case as to all the evidence Defendants will present. Nevertheless, Defendants expect to introduce the following exhibits:

Def.-A Classification Hearing Form, 11/18/2016 (000371).¹

Defendants may also introduce the following exhibits:

Def.-B Inter-Office Communication from Rubino to Cutt, 12/8/2016 (000355);

Def.-C Inter-Office Communication from Hansen to Chrisman, 1/31/2017 (000382);

¹ Number in parentheses is the Bates Stamp Number as supplied by Defendants to Plaintiff in discovery.

Def.-D Inter-Office Communication from Preston to Chrisman, 1/31/2017 (000379);

Def.-E Inter-Office Communication from Henderson to Chrisman, 2/15/2017 (000380);

Def.-F Report of Incident, 11/21/2016 (000030-31);

Def.-G Conduct Violation Report, 11/15/2016, and related Disciplinary Action Report (000076-77);

Def.-H Conduct Violation Report, 11/15/2016, and related Disciplinary Action Report (000080-81);

Def.-I Informal Resolution Request, 12/7/2016 (000394-99);

Def.-J Affidavit of Lautha Anderson, signed 6/5/2020 (ECF Doc. No. 79);

Def.-K Amended Complaint, filed 12/11/2017 (ECF Doc. No 6);

Def.-L Complaint, filed 10/30/2017 (ECF Doc. No. 1);

Def.-M Medical Accountability Records System, Objective Information, 11/21/2016 (Exhibit C to Complaint filed on 10/30/2017 (ECF Doc. No. 1));

Def.-N Medical Accountability Records System, Nurse Encounter Soap Notes, 11/21/2016 (Exhibit D to Complaint filed on 10/30/2017 (ECF Doc. No. 1)).

Def.-O Face Sheet of Lautha Anderson

Defendants seek to authenticate Exhibits Def. A – Def. I and Def. O as records of regularly conducted activity by affidavit or declaration pursuant to Fed R. Evid. 902(11).

Defendants wish to reserve the right to present other exhibits depending on the evidence offered by Plaintiff at trial, including exhibits needed to impeach or rebut Plaintiff's testimony or evidence.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANTS
RUBINO, PRESTON, AND HANSEN**

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2020, I electronically filed the foregoing with the Clerk of the Court's ECF system which sent notice to:

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